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BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

CTIA Petition for Waiver to Extend
the Implementation Deadlines of
Wireless Number Portability

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CC Docket No. 95-116

To: The Chief, Wireless Telecommunications Bureau

COMMENTS OF
SOUTHERN COMPANY

Southern Company ("Southern"), by its attorneys, hereby submits these
Comments in response to the invitation extended by the Wireless
Telecommunications Bureau in the above-captioned Public Notice, released on
December 9, 1997.

Introduction and Background

Southern, an electric public utility holding company, operates through its
subsidiary, Southern Communications, a unique, digitally-enhanced, wide-area
Commercial Mobile Radio System ("CMRS") in the Southeastern U.S.^{1/} Southern's

^{1/} In late December of 1994, the Securities and Exchange Commission
approved the formation of Southern Communications Services, Inc., a wholly-
owned subsidiary of Southern, organized to provide land mobile radio service both
to the affiliated operating companies and to the public on a commercial basis. The
Southern Company, Memorandum Opinion and Order, authorizing Acquisition of

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CMRS system is the largest centrally switched state-of-the-art digital 800 MHz Specialized Mobile Radio (SMR) system in the world, with an authorized service area of more than 120,000 square miles. The system provides internal communications for Southern's five operating companies as well as for external customers. Currently, Southern has 335 base station sites constructed and in operation. Southern anticipates having almost 500 sites to provide robust service and to meet its commercial demands.

In the First Report and Order on Telephone Number Portability, the Commission required all cellular, broadband Personal Communications Service (PCS) and covered SMR providers ("CMRS providers") to have the capability to offer service provider number portability throughout their networks, including the ability to support roaming, by June 30, 1999. The Commission delegated authority to the Chief of the Wireless Telecommunications Bureau to waive or stay any of the dates in the implementation schedule, to the extent necessary to ensure the efficient development of number portability, for a period not to exceed nine months.

Comments

As a CMRS provider, Southern is vitally impacted by the Commission's decision in the First Report and Order to require wireless number portability. Accordingly, Southern fully supports the petition filed by the Cellular Telecommunications Industry Association (CTIA) requesting that the Wireless Telecommunications Bureau invoke its Commission-delegated authority to waive or stay wireless number portability implementation dates. A delay of nine months, until March 31, 2000, as requested by CTIA, for the implementation of service provider number portability would well serve the CMRS industry.

In its Petition for Extension, CTIA thoroughly documents the additional issues that must be addressed, and additional work that must be accomplished, by the CMRS industry before fully implemented service provider number portability can be a reality. The relatively modest nine-month extension which the Commission's First Report and Order places in the hands of the Wireless Telecommunications Bureau, to be used at the Bureau Chief's discretion, would well serve Southern and the industry in efforts to meet wireless number portability obligations.

Southern notes that important standard setting mechanisms must be in place, and hardware and software solutions developed and tested, before wireless number portability can be fully effectuated. Further, Southern notes that wireless number portability standards are inherently dependent on the establishment of wireline number portability standards. Hardware and software changes would also

have to be implemented for call processing, customer service operations, and billing and accounting systems.

The efficient implementation of wireless number portability requires that Southern be able to utilize regional shared databases. This requires network, operational and administrative modifications for hardware and software necessary to provide connectivity with the database. Southern's system will require conforming changes including customer support, business management information technology, switching, and network management.

Southern also urges the Bureau to note that the series of protocols and standards needed to effectuate the information exchanges that are at the heart of number portability are operations support systems (OSS) that are driven by the landline wireline industry. These wireline OSS structures will be used for implementing wireless number portability as well. As CTIA states in its Petition, the wireless industry cannot complete provisions for number portability until wireline number portability standards are finalized.

The CTIA Petition notes the important issue of maintaining nationwide roaming in a number portability environment. Indeed, the industry's goal is to develop number portability solutions that are transparent to subscribers and permit nationwide roaming. Concerning nationwide roaming, Southern wishes to reference the Supplemental Comments it recently filed with the Commission in response to the agency's solicitation of additional public input on automatic

roaming proposals for CMRS providers.² In its Supplemental Comments, Southern emphasized that market forces in the covered SMR industry are such that imposition by the Commission of an automatic roaming requirement would be pro-competitive. Given the compatibility required for technically similar services between nationwide roaming and number portability solutions, Southern notes that additional time provided the CMRS industry for overcoming obstacles to wireless number portability will also assure full support for nationwide automatic roaming on a service by service basis.

Conclusion

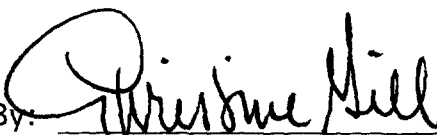
The Bureau's grant of the additional time requested in the CTIA Petition for Extension will help to ensure that the public has available wireless number portability mechanisms that are transparent to the CMRS subscriber and feasible and workable for CMRS providers. Accordingly, Southern urges the Wireless

² Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio Services, CC Docket No. 94-54, Second Report and Order and Third Notice of Proposed Rulemaking, 61 Fed. Reg. 43977 (August 27, 1996). Commission Seeks Additional Comment on Automatic Roaming Proposals for Cellular, Broadband PCS, and Covered SMR Networks, Public Notice, DA 97-2558, released December 5, 1997. Southern's Supplemental Comments were timely filed on January 5, 1998.

Telecommunications Bureau to act on the CTIA petition consistent with the views expressed herein.

Respectfully submitted,

SOUTHERN COMPANY

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